

1 RENE L. VALLADARES
Federal Public Defender
2 State Bar No. 11479
MARGARET W. LAMBROSE
3 Assistant Federal Public Defender
Nevada State Bar No. 11626
4 411 E. Bonneville, Ste. 250
Las Vegas, Nevada 89101
5 (702) 388-6577/Phone
(702) 388-6261/Fax
6 Maggie_Lambrose@fd.org
7 Attorney for Jason Hines
8

9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,
12
13 Plaintiff,
14 v.
15 JASON HINES,
16 Defendant.

Case No. 2:18-cr-00307-APG-NJK

**STIPULATION TO CONTINUE
SENTENCING HEARING**
(Fourth Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.
18 Trutanich, United States Attorney, and Robert Knief, Assistant United States
19 Attorney, counsel for the United States of America, and Rene L. Valladares,
20 Federal Public Defender, and Margaret W. Lambrose, Assistant Federal Public
21 Defender, counsel for Jason Hines, that the Sentencing Hearing currently
22 scheduled on July 21, 2020, be vacated and continued to a date and time convenient
23 to the Court, but no sooner than forty-five (45) days.

24 This Stipulation is entered into for the following reasons:

25 1. In light of the current COVID-19 pandemic, the State of Nevada's
26 resulting emergency declarations, widespread calls to take more aggressive social

1 distancing measures, and this Court's stated goal to "striv[e] to eliminate in-person
2 court appearances,"^[1] the parties request this Court continue the sentencing
3 hearing to a later date.

4 2. The defendant is not in custody and agrees with the need for the
5 continuance.

6 3. The parties agree to the continuance.

7 4. This is the fourth request for a continuance of the sentencing hearing.
8

9 DATED this 13th day of July, 2020.
10

11 RENE L. VALLADARES
12 Federal Public Defender

NICHOLAS A. TRUTANICH
United States Attorney

13
14 By /s/ Margaret W. Lambrose
15 MARGARET W. LAMBROSE
Assistant Federal Public Defender

By /s/ Robert Knief
ROBERT KNIEF
Assistant United States Attorney

16
17
18
19
20
21
22
23
24
25
26

^[1] See District of Nevada Temporary General Order 2020-04, available at
<https://www.nvd.uscourts.gov/wpcontent/uploads/2020/03/Temporary-General-Order-2020-04-re-Covid19.pdf>.

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,
4
5 Plaintiff,

6 v.

7 JASON HINES,
8 Defendant.

Case No. 2:18-cr-00307-APG-NJK

ORDER

9
10 IT IS THEREFORE ORDERED that the sentencing hearing currently
11 scheduled for Tuesday, July 21, 2020 at 10:30 a.m., be vacated and continued to
12 September 15, 2020 at the hour of 9:30 a.m. in Courtroom 6C.

13 DATED this 13th day of July, 2020.

14
15 

16 UNITED STATES DISTRICT JUDGE
17
18
19
20
21
22
23
24
25
26